

### **REMARKS/ARGUMENTS**

Claims 1-2, 10, 15, 21, and 26-27 stand rejected under 35 U.S.C. §103(a) over U.S. Patent No. 6,107,979 (Chiu) in view of U.S. Patent No. 6,667,744 (Buckelew). Applicant respectfully traverses the rejection. With regard to claim 1, there is no teaching or suggestion in either reference that a multi-pixel memory array is physically decoupled from a multi-pixel display array. In this regard, the Office Action concedes that Chiu does not teach or suggest such an arrangement. Nor does Buckelew. Instead, the cited portion of Buckelew merely states that certain plane sets within a frame buffer are physically separated from each other within the frame buffer. Buckelew, col. 17, ln. 66 – col. 18, ln. 11. This does not teach or suggest decoupling of a memory array and display array.

Nor is there any motivation to combine Chiu and Buckelew. In this regard, Buckelew has no bearing on a spatial light modulator. Instead, Buckelew merely discloses processing of graphics data using a conventional frame buffer. That is, there is no teaching or suggestion in either reference of any manner in which the frame buffer of Buckelew could be incorporated into the digital mirror display of Chiu. For at least these reasons, claims 1-2, 10, 15, 21 and 26-27 are patentable over the proposed combination.

Independent claim 21 is further patentable, as neither reference teaches or suggests performing a digital function on a pixel data value and a present counter value. In this regard, the Office Action refers to Chiu, and more specifically to a data complementer circuit 56, “which controls the data pixel data transfer as true/false data.” Office Action, p. 4. However, data complementer circuit 56 merely passes data or an inverted version of the data based upon a control signal. Chiu col. 16, ln. 64-col. 17, ln. 14. Nowhere does this teach or suggest performing a digital function on pixel data and a present counter value. Accordingly, for this further reason, claims 21 and 26-27 depending therefrom are patentable over the proposed combination.

Claims 3-9, 11-14, 16-20, 22-25, and 44-47 stand rejected under 35 U.S.C. §103(a) over Chiu and Buckelew and in further view of U.S. Patent No. 5,986,796 (Miles). The rejection is improper, at least for the reason discussed above regarding claim 1. The rejection of claim 3 is improper for the further reason that none of the references teach or suggest a global counter coupled to a local pulse width modulation drive circuit to provide a global count thereto. In this regard, while Miles teaches the presence of a counter, such counter is nowhere coupled to a local

pulse width modulation drive circuit. Instead, counter 320 of Miles is used to measure light intensity. Miles, col. 11, ln. 51 – col. 12, ln. 18. Nowhere in Miles is counter 320 coupled to provide a global count to a local pulse width modulation drive circuit. Accordingly, for these further reasons, claims 3-9, 12-13, and 17-20 are patentable over the proposed combination. Claims 11, 14, 16, and 22-25 and 44-47 are patentable at least for the same reasons discussed above regarding claim 1.

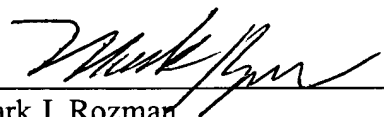
Also for at least the same reasons discussed above with regard to claim 1, the rejection of pending claims 34 and 35 under §103(a) over Chiu in view of Buckelew and in further view of U.S. Patent No. 5,565,882 (Takanashi) is improper.

New dependent claims 48-53 are patentable for at least the same reasons as the independent claims from which they depend.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

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